

Exhibit 2

CLEARY GOTTlieb STEEN & HAMILTON LLP

One Liberty Plaza
New York, NY 10006-1470
T: +1 212 225 2000
F: +1 212 225 3999
clearygottlieb.com

WASHINGTON, D.C. • PARIS • BRUSSELS • LONDON • MOSCOW
FRANKFURT • COLOGNE • ROME • MILAN • HONG KONG
BEIJING • BUENOS AIRES • SÃO PAULO • ABU DHABI • SEOUL

D: +1 212-225-2086
jrosenthal@cgsh.com

THOMAS J. MOLONEY RICHARD S. LINDER JAMES A. DUNCAN STEVEN M. LOEB CRAIG B. BROD NICOLAS GRABAR CHRISTOPHER E. AUSTIN HOWARD S. ZELBO DAVID E. BRODSKY ARTHUR H. KOHN RICHARD J. COOPER JEFFREY S. LEWIS PAUL J. SHIM STEVEN L. WILNER ANDRES DE LA CRUZ DAVID C. LOPEZ MICHAEL A. GERSTENZANG LEV L. DASSIN NEIL Q. WHORISKEY JORGE U. JUANTORENA MICHAEL D. WEINBERGER DAVID LEINWAND DIANA L. WOLLMAN JEFFREY A. ROSENTHAL MICHAEL D. DAYAN CARMINE D. BOCCUZZI, JR. JEFFREY D. KARP KIMBERLY BROWN BLACKLOW ROBERT J. RAYMOND SUNG K. KANG SANDRA L. FLOW FRANCISCO L. CESTERO FRANCESCA L. ODELL WILLIAM J. MCRAE DANIEL C. REYNOLDS JOON H. KIM	MARGARET S. PEONIS LISA M. SCHWEITZER JUAN G. GIRÁLDEZ DUANE MCLAUGHLIN BREON S. PEACE CHANTALE E. KORDULA BENET J. O'REILLY ADAM E. FLEISHER SEAN A. O'NEAL GLENN P. MCGRORY MATTHEW P. SALERNO MICHAEL J. ALBANO VICTOR L. HOU ROGER A. COOPER AMY R. SHAPIRO JENNIFER KENNEDY PARK ELIZABETH LENAS LUKE A. BAREFOOT JONATHAN S. KOLODNER DANIEL ILAN MEYER H. FEDIDA ADRIAN R. LEPSIC ELIZABETH VICENS ADAM J. BRENNEMAN ARI D. MACKINNON JAMES E. LANGSTON JARED GERBER COLIN D. LLOYD COREY M. GOODMAN RISHI ZUTSHI JANE VANLARE DAVID H. HERRINGTON KIMBERLY R. SPOERRI AARON J. MEYERS DANIEL C. REYNOLDS ABENA A. MAINOO	HUGH C. CONROY, JR. JOSEPH LANZKRON MAURICE R. GINDI KATHERINE R. REAVES RAHUL MUKHI ELANA S. BRONSON MANUEL SILVA KYLE A. HARRIS LINA BENSMAN ARON M. ZUCKERMAN RESIDENT PARTNERS SANDRA M. ROCKS JUDITH KASSEL PENELOPE L. CHRISTOPHOU BOAZ S. MORAG MARY E. ALCOCK HEIDE H. ILGENFRITZ KATHLEEN M. EMBERGER AVRAM E. LUFT ANDREW WEAVER HELENA K. GRANNIS JOHN V. HARRISON CAROLINE F. HAYDAY NEIL R. MARKEL KENNETH S. BLAZEJEWSKI LAURA BAGARELLA SHIRLEY M. LO JONATHAN D.W. GIFFORD SUSANNA E. PARKER DAVID W.S. YUDIN RESIDENT COUNSEL LOUISE M. PARENT OF COUNSEL
--	---	--

May 5, 2020

VIA ELECTRONIC MAIL

Jennifer Selendy, Esq.
Selendy & Gay PLLC
1290 Avenue of the Americas
New York, New York 10104

Re: *In re*: Application of Vale S.A., Vale Holdings B.V., and Vale International S.A. for an Order Pursuant to 28 U.S.C. §1782 to Conduct Discover for Use in Foreign Proceedings

Dear Ms. Selendy,

We write on behalf of Vale S.A., Vale Holdings B.V. and Vale International S.A. (collectively "Vale") in response to your letter of May 4, 2020.

At the outset, please disclose the basis for your statement that "we have reason to believe that Vale has provided the names of Fine Arts, Mr. Camhis and related individuals to the press in connection with your filing of the 1782 Application." Your insinuation is not accurate, and we have not seen any press account of the 1782 Application that has gone beyond its publicly filed contents. We would urge you not to make such allegations, particularly in a matter in which you have just become involved, without checking your facts.

Your clients are obviously free to oppose the 1782 Application on any good faith basis you deem relevant. Should you do so based on your assertion that the application is vexatious because of the lack of any relationship between Mr. Camhis and Beny Steinmetz, we will look forward to presenting our evidence and legal arguments. The statements in your letter, and the tone of your accusations, make us wonder how well you know your client.

Very truly yours,


Jeffrey A. Rosenthal